

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SAGUN TULI, M.D.	)	
Plaintiff	)	Case No. 1:13-cv-11023-MLW
v.	)	
GARY M. VOTOUR, and	)	
AUTOMATTIC, INC.	)	
Defendants	)	

**DEFENDANT GARY M. VOTOUR'S MOTION FOR  
JUDGMENT ON THE PLEADINGS**

Pursuant to Fed. R. Civ. P. 12(c), Defendant Gary M. Votour hereby moves this Court to enter judgment on the pleadings in his favor and for an order dismissing Plaintiff's Complaint with prejudice.

As grounds for the motion, Mr. Votour relies on the accompanying Memorandum of Law and the pleadings and all exhibits attached thereto.

WHEREFORE, and for the reasons discussed more fully in the accompanying Memorandum of Law, Mr. Votour respectfully moves for judgment on the pleadings in his favor and for an order dismissing the Complaint with prejudice and for such further relief the Court deems fair and just.

**Request for Oral Argument**

Pursuant to Local Rule 7.1(d), Mr. Votour hereby requests oral argument on this motion.

Respectfully Submitted,

Gary M. Votour

By his attorneys,

/s/ Adam J. Hornstine

George W. Mykulak (BBO No. 365990)

George.Mykulak@wilmerhale.com

Adam J. Hornstine (BBO No. 666296)

Adam.Hornstine@wilmerhale.com

Wilmer Cutler Pickering Hale and Dorr LLP  
60 State Street

Boston, MA 02109

Telephone: (617) 526-6000

Facsimile: (617) 526-5000

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

I, Adam J. Hornstine, hereby certify pursuant to Local Rule 7.1(a)(2) that counsel for Defendant conferred with counsel for Plaintiff on May 14, 2013 to determine in good faith whether any of the disputed issues presented by this motion, as articulated in the accompanying Memorandum of Law, could be resolved, but no agreement was reached.

/s/ Adam J. Hornstine

Adam J. Hornstine

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document, filed through the ECF system, will be sent electronically to the registered participants of record as identified on the Notice of Electronic Filing on May 15, 2013.

/s/ Adam J. Hornstine

Adam J. Hornstine